

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

DEC 11 2024

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

IN RE DIGITAL MILLENNIUM
COPYRIGHT ACT SECTION 512(h)
SUBPOENA TO TUMBLR, INC.

1:24-cv-12718
Case No. Judge: Jeremy C. Daniel
Magistrate Judge: Young B. Kim
RANDOM / CAT 5

MOTION FOR ISSUANCE OF SUBPOENA PURSUANT TO 17 U.S.C. § 512(h)

Plaintiffs, Nima Gharavi and Right Call Officials, Inc., respectfully move this Court for an order directing the Clerk of Court to issue a subpoena pursuant to 17 U.S.C. § 512(h) to Tumblr, Inc. ("Defendant") for the purpose of identifying an alleged infringer of Plaintiffs' copyrighted work(s). In support of this Motion, Plaintiff states as follows:

1. **Plaintiff's Copyright Ownership:** Plaintiffs are the owners of the copyright(s) in the work(s) titled "138 – Tyler Nelson {G} of Morris Fitness GA vs. Keegan Roberson {R} of Illinois CornStars."
2. **Alleged Infringement:** Plaintiffs have discovered that an individual or individuals using Defendant's platform have infringed Plaintiffs' copyright(s) by publishing an unauthorized reproduction copied from Plaintiffs' original video to which Plaintiffs retain exclusive worldwide copyright.
3. **Notification Sent to Service Provider:** On August 11, 2024, Plaintiffs sent a notification to Defendant in compliance with 17 U.S.C. § 512(c)(3)(A), requesting the removal of the infringing material. A copy of this notification is attached hereto as Exhibit 1.

4. **Purpose of Subpoena:** The purpose of this subpoena is to obtain information sufficient to identify the alleged infringer(s), including but not limited to the individual name, organization name, associated email address, associated phone number, associated mailing address, date of birth, account creation date, account registration IP address, trailing twelve month IP address history, and any other identifying information in the possession of Defendant for the platform user with the Uniform Resource Indicator (URI) “wrestlerx.tumblr.com”.
5. **Compliance with Statutory Requirements:** Pursuant to 17 U.S.C. § 512(h)(2), Plaintiffs have submitted:
 - A copy of the notification sent to Defendants (Exhibit 1);
 - A proposed subpoena (Exhibit 2); and
 - A sworn declaration confirming that the subpoena is sought solely for the purpose of protecting Plaintiffs rights under Title 17 (Exhibit 3).
6. **Clerk’s Duty to Issue Subpoena:** Under 17 U.S.C. § 512(h)(4), if the notification satisfies the requirements of Section 512(c)(3)(A), and the proposed subpoena and declaration are in proper form, the Clerk of Court must expeditiously issue and sign the subpoena.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court direct the Clerk of Court to issue and sign the proposed subpoena attached as Exhibit 2, so that it may be served upon Defendant.

Dated: December 11, 2024

By: 

Nima Gharavi
President, Right Call Officials, Inc.
657 W Melrose Street
Chicago, IL 60657
nima@midwestwrestle.com
(773) 899-4688

Pro Se

Attachments:

- **Exhibit 1:** Copy of DMCA Takedown Notification
- **Exhibit 2:** Proposed Subpoena
- **Exhibit 3:** Sworn Declaration

Exhibit 1

From: tumblr <dmca@tumblr.com>
Sent: Thursday, August 15, 2024 6:00 PM
To: Nima Gharavi <Nima@Colorado.EDU>
Subject: [tumblr] Re: DMCA Copyright Notification

- Please type your reply above this line -##

Your request (10277933) has been updated. To add additional comments, reply to this email.

Tumblr Trust & Safety (tumblr)

Aug 15, 2024, 6:59 PM EDT

Hello,

<https://www.tumblr.com/athletic-collection/707252225222868992/jimmy-nugent>
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proud

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<https://youmustlovehim.tumblr.com/post/661200164021747712/keegan-roberson>

Your DMCA Notice has been received and reviewed for completeness.

In accordance with the requirements set forth by the DMCA, we have disabled access to the allegedly infringing material. You may need to clear your browser's cache to see the removal. If you need more information on how to clear your browser's cache, you can find that in the [Clear Your Browser Cache](#)

section of our [Common Browser Issues](#) support page. Depending on the strain on our servers, it can sometimes take up to three hours for the changes to take effect.

Please note that we have notified the user who uploaded the material to provide them an opportunity to formally challenge this removal. We will notify you if the user submits a counter notice.

Thank you,
Tumblr Trust & Safety

<https://www.tumblr.com/abuse>

Nima Gharavi

Aug 14, 2024, 2:26 PM EDT

As requested, the electronic signature with the full legal name of the copyright owner:

Regards,

Nima Gharavi

Attachment(s)
[image002.png](#)

Tumblr Trust & Safety (tumblr)

Aug 13, 2024, 11:24 PM EDT

Hello,

We appreciate you reaching out to us and we are sorry to hear that you believe a user of our services is making unauthorized use of your copyrighted material.

Tumblr, does not approve of (and in fact prohibits) the unauthorized use of copyrighted materials on its service. It's important to us to see that creators receive proper credit for their work on Tumblr, and we try to provide copyright holders with tools to protect against the unauthorized use of their content.

Pursuant to the Digital Millennium Copyright Act (DMCA), a US law that governs our operations, we respond promptly to allegations of infringement; and in order to remove this content from our service, we do need your help. Under the safe harbor provisions of the DMCA, providers of services such as Tumblr are not required to locate (and indeed feasibly cannot know the status of) infringing material.

The problem we face is that your notice doesn't give us the level of specificity we need and therefore your notice is incomplete.

Specifically, you have not provided us with:

* An electronic signature with the full legal name of the copyright owner or a person authorized to act on their behalf (You can send us a scan or photo of your signature, or simply type out your name to serve as an electronic signature.);

Additionally, be aware that your notice — including any contact information you have provided (address, telephone number, and email address) — will be forwarded to the user who uploaded the material at issue.

Please know that we take our obligation to address allegations of infringement very seriously, and will continue to work with you to address your concerns. Please visit <http://www.tumblr.com/dmca> or respond with the missing information described above - along with the information from your previous email - to submit a complete DMCA notice.

We await your response so we can act in accordance with our policies and procedures.

Tumblr Trust & Safety

<https://www.tumblr.com/abuse>

Nima Gharavi

Aug 11, 2024, 10:54 PM EDT

Dear Tumblr,

Per the Digital Millenium Copyright Act, I am writing to inform you of the presence of unauthorized reproductions of my original, copyrighted works on your platform.

The copyrighted works that were infringed are hundreds of videos that I created and that I retain exclusive copyright to:

<https://www.youtube.com/@MidwestWrestle/videos>

The 236 infringing works are unauthorized reproductions copied from my original videos that I created and that I retain exclusive copyright to:

<https://www.tumblr.com/legallyfresh/732041988887724032>

<https://www.tumblr.com/bulgingandmore/693280818035097600>

<https://www.tumblr.com/collectionmtx/750520926984110080/vance-williams>

<https://www.tumblr.com/jockstrapme2/737539421695508480/wrestling-brought-into-submission>

<https://www.tumblr.com/spndxjck2/743343877226905600>

<https://lovelyangryheart.tumblr.com/post/736591591538556928>

<https://www.tumblr.com/lookatthebulges/739987601180753920>

<https://www.tumblr.com/wrestlingdominations/725587730981060608>

<https://www.tumblr.com/sport-bulge/688868007253082112>

<https://www.tumblr.com/sport-bulge/688868085842722816>

<https://www.tumblr.com/athletic-collection/707252225222868992/jimmy-nugent>

<https://www.tumblr.com/athletic-collection/707251387052048384/jimmy-nugent>

<https://www.tumblr.com/athletic-collection/705380076837011456/jimmy-nugent>

<https://www.tumblr.com/athletic-collection/705352588428771328/jimmy-nugent>

<https://www.tumblr.com/athletic-collection/705380377993347072/cayden-henschel-top>

<https://www.tumblr.com/athletic-collection/705380425974136832/cayden-henschel>

<https://www.tumblr.com/athletic-collection/706077798749585408/cayden-henschel>

<https://www.tumblr.com/justinhustlesblog/752112651397742592>

<https://wrestling-zootopia.tumblr.com/post/754522137630490624/wrestling-zootopia>

<https://www.tumblr.com/thines85/756564924267986944/locked-in>

<https://www.tumblr.com/thewrestlerstents/745043637397749760>

<https://www.tumblr.com/spndxick2/742420648661565440>

<https://www.tumblr.com/bulgingandmore/740495610704166912>

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<https://www.tumblr.com/athletic-collection/715159999603671040>

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<https://www.tumblr.com/bulgingandmore/707778090248683520>

<https://www.tumblr.com/scrumjock/709297846361505792/on-top-and-bulging>

<https://www.tumblr.com/athletic-collection/708884446913429504>

<https://www.tumblr.com/bob398031/643416569602506752>

<https://www.tumblr.com/justinhustlesblog/711541303470653440>

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<https://www.tumblr.com/athletebulge/687339801873121280>

<https://www.tumblr.com/sportingwood1/752327913749299200/jock-worthy>

<https://www.tumblr.com/mauroilmix-blog/716043742225776640>

<https://www.tumblr.com/justinhustlesblog/700648668129312769>

<https://www.tumblr.com/athletic-collection/707251171066314752/jimmy-nugent>

<https://cyfrin.tumblr.com/post/716474560140181504>

<https://www.tumblr.com/athletic-collection/691214539920965632>

<https://www.tumblr.com/justinhustlesblog/700143365513199616>

<https://www.tumblr.com/sporttights/711717446109855745>

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<https://www.tumblr.com/tumei/698069571676127232>

<https://www.tumblr.com/wrestlingdominations/722413149927702528>

<https://lovelyangryheart.tumblr.com/post/737702428996255744>

<https://lovelyangryheart.tumblr.com/post/738946664772009984/jimmy-nugent>

<https://www.tumblr.com/scrumjock/705411673132040192/wisconsin-bulge>

<https://www.tumblr.com/athletic-collection/721023995136376832/brian-bonino>

<https://www.tumblr.com/collectionmtx/750521822652579840/marco-spinazzola>

<https://www.tumblr.com/legallyfresh/731584667755675648>

<https://www.tumblr.com/athletic-collection/707251261842571264/jimmy-nugent>

<https://www.tumblr.com/athletic-collection/706889034918772736/jimmy-nugent>

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<https://www.tumblr.com/athletic-collection/706527555349626880>

<https://www.tumblr.com/athletic-collection/705380032109035520/jimmy-nugent>

<https://www.tumblr.com/athletic-collection/705380125952376832/jimmy-nugent>

<https://www.tumblr.com/athletic-collection/705380168163835904/jimmy-nugent>

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<https://lovelyangryheart.tumblr.com/post/743932382667833344>

<https://www.tumblr.com/beyondhotmales/723878156799459328>

<https://www.tumblr.com/circumcised-sports-guys/755656706815655936>

<https://blackleatherhood.tumblr.com/post/712558980787994624>

<https://www.tumblr.com/butchieboxing/755292660929101824/more-corn-fed>

<https://www.tumblr.com/sportingwood1/754587539280691200/jock-worthy>

<https://allessio77.tumblr.com/post/743321165367574530/pre-match-heaviness>

<https://fratguys.tumblr.com/post/751893402353860608>

<https://lovelyangryheart.tumblr.com/post/744752948842774528>

<https://underthemattress2.tumblr.com/post/747414647517429760>

<https://www.tumblr.com/spndxjck2/748899462952386560>

<https://college-bros.tumblr.com/post/734258618769293312>

<https://nicolettosworld.tumblr.com/post/734782776806703104/because-we-love-wrestling-and-hot-proud-sexy>

<https://www.tumblr.com/blueeaglepartyclod/743322725294243840/cocky-strut>

<https://wrestlerx.tumblr.com/post/743788137289039872/great-singlet-used-to-ref-these-guys-during>

<https://www.tumblr.com/sporttights/686497556250935296>

<https://firebootrik.tumblr.com/post/734258195178176512>

<https://www.tumblr.com/footballdreamlife/710638410709270528>

<https://vplbulgeman.tumblr.com/post/717152623136997376>

<https://www.tumblr.com/scrunjock/716726758968328192/rangers-bulge>

<https://college-bros.tumblr.com/post/711998805198929920>

<https://www.tumblr.com/08civvmani/708416425729114112>

<https://www.tumblr.com/athletic-collection/708454923418927104/cayden-henschel>

<https://youmustlovehim.tumblr.com/post/661200164021747712/keegan-roberston>

<https://wrstle-bulges-plus.tumblr.com/post/686179002564624384/most-perfect-arse-in-a-singlet-i-have-seen-in-a>

<https://www.tumblr.com/scrunjock/710666240971112448/strutting>

<https://www.tumblr.com/wrestlememen/709430492606464000>

<https://www.tumblr.com/scrunjock/708854177849344000/bulging-in-his-singlet>

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<https://www.tumblr.com/sporttights/661477254016221185>

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<https://www.tumblr.com/mauroilmix-blog/735416026955661312>

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<https://www.tumblr.com/txgaycountry/711253751599644672>

<https://www.tumblr.com/bulgingandmore/700832510387585024>

<https://college-bros.tumblr.com/post/716359684115857408/hottest-sport-hockey-wrestling-lacrosse>

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<https://college-bros.tumblr.com/post/734258752796196864>

<https://letsgosf.tumblr.com/post/721861954130591744>

<https://www.tumblr.com/txgaycountry/725184599866605568>

<https://www.tumblr.com/mauroilmix-blog/740890882995355648>

<https://www.tumblr.com/butchieboxing/751842876555771904/corn-star>

<https://www.tumblr.com/butchieboxing/754653203754303488/tight>

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<https://www.tumblr.com/athletic-collection/728090174420123648/jimmy-nugent>

<https://www.tumblr.com/athletic-collection/728090136793972736/jack-severin>

<https://www.tumblr.com/athletic-collection/728089795575808001/jack-severin>

<https://www.tumblr.com/athletic-collection/733068425029615616/jacob-brya>

<https://www.tumblr.com/athletic-collection/733068662784786432/jacob-brya-left>

<https://www.tumblr.com/athletic-collection/735335318146908160>

<https://www.tumblr.com/spndxjck2/754282410174267392>

<https://www.tumblr.com/spndxjck2/757274737219141632>

<https://www.tumblr.com/athletic-collection/745850565358125056/jimmy-nugent>

<https://www.tumblr.com/justinhustlesblog/700143466244718592>

<https://www.tumblr.com/justinhustlesblog/700143488050888704>

<https://www.tumblr.com/justinhustlesblog/700143631944826880>

<https://www.tumblr.com/justinhustlesblog/700143669371633664>

<https://www.tumblr.com/justinhustlesblog/700143704842944513>

<https://www.tumblr.com/justinhustlesblog/700143787112120320>

<https://www.tumblr.com/justinhustlesblog/700143908125114368>

<https://www.tumblr.com/justinhustlesblog/700144802472329216>

<https://www.tumblr.com/justinhustlesblog/700178207992905728>

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<https://www.tumblr.com/justinhustlesblog/700864723778961408>

<https://www.tumblr.com/justinhustlesblog/701372628271808512>

<https://www.tumblr.com/justinhustlesblog/701372669259612160>

<https://www.tumblr.com/justinhustlesblog/701372697216778240>

<https://www.tumblr.com/justinhustlesblog/701372773440815104>

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<https://www.tumblr.com/justinhustlesblog/711540930085371904>

<https://www.tumblr.com/justinhustlesblog/711540994225684481>

<https://www.tumblr.com/justinhustlesblog/711541085000859648>

<https://www.tumblr.com/justinhustlesblog/711783369504079873>

<https://www.tumblr.com/justinhustlesblog/711783467909890048>

<https://wrestling-zootopia.tumblr.com/post/758115494897287168>

<https://wrestlerboys.tumblr.com/post/712565925670453248>

<https://wrestlerboys.tumblr.com/post/745851437525975040>

<https://www.tumblr.com/bulgingandmore/688862371715956736>

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<https://www.tumblr.com/bulgingandmore/711296541386817536>

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<https://www.tumblr.com/bulgingandmore/740697069236436992>

<https://www.tumblr.com/bulgingandmore/740698852134354944>

<https://www.tumblr.com/bob398031/654848869931368448>

<https://www.tumblr.com/thines85/755749596365553664/olympic-wrestler-getting-ready>

<https://www.tumblr.com/athleticsupporter/706626227681869824/hold-the-position-for-a-brief-moment-mount-and-go>

<https://www.tumblr.com/thines85/756111918468595712/walking-in-white>

<https://www.tumblr.com/thines85/756202512554557441/holding-on>

<https://www.tumblr.com/thines85/756293252215439360>

<https://www.tumblr.com/thines85/756383792880549888/heavy>

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<https://www.tumblr.com/jockstrapme2/757206167160291328/wrestling-riding-your-opponent>

<https://www.tumblr.com/thines85/756474284095963136/headrest>

<https://www.tumblr.com/thines85/756655504661544960/tugging-away>

<https://www.tumblr.com/jockstrapme2/757206167160291328/wrestling-riding-your-opponent>

<https://www.tumblr.com/jockstrapme2/745967114830135296/wrestling-riding-your-opponent>

<https://www.tumblr.com/jockstrapme2/756850178556887040/wrestling-going-for-the-pin>

<https://wrestling-zootopia.tumblr.com/post/755800968181022720>

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<https://www.tumblr.com/thines85/756927275873763328>

<https://www.tumblr.com/thines85/757017933634568192/walking-in-white>

<https://www.tumblr.com/sport-bulge/688867990879485952>

<https://www.tumblr.com/jockstrapme2/741972465298882560/wrestling-going-to-the-mat>

<https://www.tumblr.com/jockstrapme2/743530726950092800/wrestling-take-down>

<https://www.tumblr.com/jockstrapme2/743690207315066880/wrestling-good-job-stud-you-made-coach-proud>

<https://www.tumblr.com/jockstrapme2/746684458707599360/wrestling-butt-seriously>

<https://www.tumblr.com/jockstrapme2/746686111956484096/wrestling-blues>

<https://www.tumblr.com/jockstrapme2/748493975884857344/wrestling-mount>

<https://www.tumblr.com/jockstrapme2/749072632591384576/wrestling-in-the-moment>

<https://www.tumblr.com/blueeaglepartyclod/743765781339308032/a-lot-to-be-proud-of>

<https://lovelyangryheart.tumblr.com/post/747844302921662465>

I have a good faith belief that the material is not authorized by me, the copyright owner, its agent, and the law.

UNDER PENALTY OF PERJURY, I am the owner of the copyright and of an exclusive right under the copyright that has allegedly been infringed.

The information provided in this notice is accurate.

I acknowledge that a copy of this infringement notice and any correspondence related to it, including any contact information I provided (name and email address), will be forwarded to the user who uploaded the content at issue. I also acknowledge that a note may be placed on the site in question detailing the name of the copyright owner who submitted the takedown notice.

Nima Gharavi

President, Right Call Officials, Inc (D.B.A. Midwest Wrestle)

222 W Merchandise Mart Plaza [#1305](#), Chicago, IL 60654

nima@midwestwrestle.com

This email is a service from tumblr. Delivered by [Zendesk](#)

Exhibit 2

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of Illinois

Nima Gharavi and Right Call Officials, Inc.

Plaintiff

v.

Tumblr, Inc.

Defendant

Civil Action No.

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

Tumblr, Inc. c/o C T Corporation System
28 Liberty Street, New York, NY 10005

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment A.

Place: Right Call Officials, Inc.
657 W Melrose Street #3
Chicago, IL 60657

Date and Time:

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk_____
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) _____

Nima Gharavi and Right Call Officials, Inc., who issues or requests this subpoena, are:

Pro Se, 657 W Melrose Street #3, Chicago, IL 60657, (773 899-4688), nima@midwestwrestle.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.: _____

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

ATTACHMENT A
SCHEDULE OF DOCUMENTS TO BE PRODUCED

DEFINITIONS

1. The uniform definitions, instructions, and rules of construction set forth in the Federal Rules of Civil Procedure are incorporated by reference as if fully set forth herein.
2. “And” and “or” are to be read interchangeably so as to give the broadest possible meaning to a particular request in which either or both is used.
3. The following definitions shall apply to the individual requests as well as the Definitions and Instructions herein.
4. “Communication” or “Communications” are used in the broadest possible sense and mean verbal, written, or electronic exchanges between two or more persons.
5. “Document” or “Documents” are used in the broadest possible sense to mean or refer to anything which may be within the meaning of Federal Rule of Civil Procedure 34.
6. “Tumblr” “You” and “Your” means Tumblr, Inc., including any of its current or former predecessors, successors, assigns, parents, subsidiaries, managers, partners, directors, shareholders, employees, employers, officers, agents, principals, officials, representatives, associates, consultants, attorneys, advisors, accountants, and all persons and entities acting or purporting to act on its behalf.
7. All other terms shall be defined by the common or dictionary meaning that would lead to the broadest and most comprehensive response, unless otherwise stated.

INSTRUCTIONS

1. Unless agreed to otherwise by the parties, electronically stored information is to be produced in single-page TIFF (Tagged Image File Format) format with available searchable text and reasonably accessible metadata. Spreadsheets, presentations, video/audio files, and any other file type that is not easily converted to an image, shall be provided in native format. Native file names should match the Bates entry for that specific record. Documents shall be produced with logical document breaks, as searchable, and with load field enabling review in common litigation databases such as Concordance and/or Relativity.

2. Whenever necessary to bring within the scope of a request a response that might otherwise be construed to be outside its scope, the following constructions should be applied:

- a. Construing the terms “and” and “or” in the disjunctive or conjunctive, as necessary, to make the request more inclusive;
- b. Construing the singular form of any word to include the plural and the plural form to include the singular;
- c. Construing the past tense of the verb to include the present tense and the present tense to include the past tense; and
- d. Construing “include” to mean include or including “without limitation.”

3. These requests are continuing in character so as to require You to produce additional documents if You obtain further or different information at any time before trial.

4. If you contend that you are entitled to withhold from production any documents requested herein on the basis of attorney/ client privilege, work-product protection, or other legally recognized grounds, identify the nature of the document(s), the date for same, the author, and the person to whom the document was addressed; identify each individual who has seen the document, each individual who has received a copy of the document and from whom the document was

received; and state the basis upon which you contend you are entitled to withhold the document from production. Accordingly, please provide a formal written privilege log of all claimed privileged documents and information.

DOCUMENT REQUESTS

1. All information regarding the identity of, including but not limited to the individual name, organization name, associated email address, associated phone number, associated mailing address, date of birth, account creation date, account registration IP address, trailing twelve-month IP address history, and any other user data for the Tumblr user with the Uniform Resource Indicator (URI) wrestlerx.tumblr.com.

Exhibit 3

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE DIGITAL MILLENNIUM
COPYRIGHT ACT SECTION 512(h)
SUBPOENA TO TUMBLR, INC.

Case No. _____


**DECLARATION IN SUPPORT OF SUBPOENA TO OBTAIN THE IDENTITY OF ALLEGED
INFRINGEMENTS PURSUANT TO 17 U.S.C. 512(h)**

I, Nima Gharavi, declare under penalty of perjury that the following is true and correct:

1. **Purpose:** I am the sole copyright holder of the work titled "138 – Tyler Nelson {G} of Morris Fitness GA vs. Keegan Roberson {R} of Illinois CornStars" ("the Work"), which is protected under U.S. copyright law. I have reason to believe that an individual has infringed upon my copyright in the Work by publishing an unauthorized reproduction copied from my original video to which I retain exclusive worldwide copyright.
2. **DMCA Notice:** On August 11, 2024, I sent a DMCA takedown notice ("Exhibit 1") to Tumblr, Inc. pursuant to 17 U.S.C. Section 512(c)(3)(A) regarding the alleged infringement.
3. **Request for Subpoena:** I am requesting the issuance of a subpoena pursuant to 17 U.S.C. § 512(h) to identify the alleged infringer. The information sought through this subpoena will be used solely for the purpose of protecting my rights under copyright law.
4. **Good Faith Belief:** I have a good faith belief that the use of the material in the manner complained of is not authorized by me, my agent, or the law.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 11, 2024 at Chicago, Illinois.

By: _____

Nima Gharavi
President, Right Call Officials, Inc.
657 W Melrose Street
Chicago, IL 60657
nima@midwestwrestle.com
(773) 899-4688

Pro Se